

AO91 (Rev. 12/03) Criminal Complaint

**FELONY****AUSA****United States Courts****UNITED STATES DISTRICT COURT**Southern District of Texas  
FILED*June 12, 2025*

Southern District Of Texas Brownsville Division

Nathan Ochsner, Clerk of Court

**UNITED STATES OF AMERICA****CRIMINAL COMPLAINT****vs.**

Reymundo IBARRA-De La Cruz  
 A200 211 663 Mexico  
 AKA Reymundo Ibarra DE LA CRUZ,Reymundo De La Cruz  
 IBARRA

Case Number: 1:25-MJ-489

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about June 10, 2025 in Cameron County, in

the Southern District Of Texas defendant(s)

an alien who had previously been denied admission, excluded, deported, or removed, knowingly and unlawfully was present in the United States having been found in Cameron County, Texas, the said defendant having not obtained the consent of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission into the United States,

in violation of Title 8 United States Code, Section(s) 1326(a)(1)

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the

following facts:

The defendant was encountered by Border Patrol agents conducting Linewatch operations near Brownsville, Texas on June 10, 2025. The defendant is a citizen and national of Mexico who was previously deported, excluded or removed from the United States on April 29, 2025. Record checks revealed that the defendant has not applied for permission from the proper Authorities to re-enter the United States.

Defendant possessed no funds at the time of arrest.

Continued on the attached sheet and made a part of this complaint:

Yes  No

Signature of Complainant

Torres, Jesus Border Patrol Agent

Printed Name of Complainant

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, on

June 12, 2025

Date

at Brownsville, Texas

City/State

Karen Betancourt  
Name of Judge

U.S. Magistrate Judge  
Title of Judge

Signature of Judge

*Karen Betancourt*